

To: FCC

From: Tim Culver

Date: 1-4-08

Subject: I strongly urge the FCC to allow AM stations to simulcast on FM translators.

1. AM stations generally serve the public interest more than FM stations.

They are often more established in the community, target a more involved and educated audience, and feature more spoken-word programming (such as interviews with community leaders and information providers). A comparison of Quarterly Issue reports between AM and FM stations will bear this out. AM stations are consistently addressing the most important community issues, have the support of community organizations, and the ear of the listeners most likely to find and implement solutions to community problems.

2. AM stations have aging infrastructures, causing signals to diminish.

Encroachment by surrounding neighborhoods and other RF signals are also contributing to this problem. Y

3. Many AM stations have directional arrays, leaving large gaps in the coverage in a community. Most were built more than 50 years ago, and population centers in local communities have shifted and have often have grown in the signal null.

4. Allowing AM stations to simulcast on FM will introduce younger listeners to programming that will benefit them and their community. Many listeners under the age of 45 are not familiar with AM radio, and are unaware of the community oriented programs heard on AM.

5. Religious broadcasters already have plenty of FM and LPFM stations in most communities. Allowing AM stations to occupy some of the adjacent frequencies will give listeners more diverse choices in their areas.

6. Allowing AM stations to broadcast on FM translators may buy these AM stations enough time to make the expensive and slow transition to digital technology, by keeping them competitive.

7. This action could level the playing field between competitors. For example: Let's say an area has two competing radio companies. One owns an AM and the other owns an FM. The company with the FM has the option

to expand its coverage area with a translator, but the company with the AM can not.

8. Smaller AM signals with foreign language and/or ethnic formats will have an opportunity to serve more of the community.

9. Music formats out of the mainstream on smaller AM signals will have an opportunity to improve audio quality and serve more of the community.